

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

Michael Brown,

Plaintiff,

v.

Accounts Receivable Management, Inc.; and
DOES 1-10, inclusive,

Defendant.

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: Civil Action No.: 1:11-cv-05130-BMC
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**NOTICE OF WITHDRAWAL OF COMPLAINT AND VOLUNTARY
DISMISSAL OF ACTION WITHOUT PREJUDICE
PURSUANT TO RULE 41(a)**

Michael Brown ("Plaintiff"), by Plaintiff's attorney, hereby withdraws the complaint and voluntarily dismisses this action, without prejudice, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i).

Dated: November 16, 2011

Respectfully submitted,

By: /s/ Sergei Lemberg
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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on November 16, 2011, a true and correct copy of the foregoing Notice of Withdrawal was served electronically by the U.S. District Court for the Eastern District of New York Electronic Document Filing System (ECF) and that the document is available on the ECF system.

By /s/ Sergei Lemberg
Sergei Lemberg